

Exhibit F

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI, MARY BLY, MICHAEL CONNELLY, SYLVIA DAY, JONATHAN FRANZEN, JOHN GRISHAM, ELIN HILDERBRAND, CHRISTINA BAKER KLINE, MAYA SHANBHAG LANG, VICTOR LAVALLE, GEORGE R.R. MARTIN, JODI PICOULT, DOUGLAS PRESTON, ROXANA ROBINSON, GEORGE SAUNDERS, SCOTT TUROW, and RACHEL VAIL, individually and on behalf of others similarly situated,

Plaintiffs,

v.

OPENAI INC., OPENAI LP, OPENAI LLC, OPENAI GP LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION LLC, OPENAI HOLDINGS LLC, OPENAI STARTUP FUND I LP, OPENAI STARTUP FUND GP I LLC, and OPENAI STARTUP FUND MANAGEMENT LLC,

Defendants.

No. 1:23-cv-08292-SHS

JONATHAN ALTER, KAI BIRD, TAYLOR BRANCH, RICH COHEN, EUGENE LINDEN, DANIEL OKRENT, JULIAN SANCTON, HAMPTON SIDES, STACY SCHIFF, JAMES SHAPIRO, JIA TOLENTINO, and SIMON WINCHESTER, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LCC, OAI CORPORATION, LLC, OPENAI HOLDINGS, LLC, and MICROSOFT CORPORATION,

Defendants.

No. 1:23-cv-10211-SHS

Subject to the foregoing General and Specific Objections, OpenAI states that it has produced documents sufficient to show the corporate formation dates for each OpenAI entity at OPCO_SDNY_0000120-175.

REQUEST FOR PRODUCTION NO. 95:

All **Documents** relating to your June 22, 2023 response to Senator Thomas Roland Tillis's questions to **You Relating to** content creators.

RESPONSE TO REQUEST FOR PRODUCTION NO. 95:

OpenAI objects to the production of electronically stored information before an applicable ESI protocol has been entered. OpenAI objects to this Request as seeking information and/or documents that are not relevant to any claim or defense in this litigation. OpenAI objects to this Request as overly broad, unduly burdensome, and disproportionate to the needs of the needs of the case to the extent it seeks "[a]ll Documents relating to" OpenAI's response to Senator Thomas Roland Tillis's questions regarding content creators. OpenAI objects to the extent that this Request calls for the discovery of information protected by attorney-client privilege, the attorney work-product immunity and/or any other applicable privilege under federal, state or local law.

Subject to the foregoing General and Specific Objections, OpenAI states that it has produced documents sufficient to show its June 22, 2023 responses on the record to Senator Thomas Roland Tillis's questions at OPCO_SDNY_0000014-24.

REQUEST FOR PRODUCTION NO. 96:

Documents sufficient to identify the bases of your "aware[ness] that creators are concerned about being replaced or displaced by AI."

RESPONSE TO REQUEST FOR PRODUCTION NO. 96:

OpenAI objects to the production of electronically stored information before an applicable ESI protocol has been entered. OpenAI objects to this Request as unduly burdensome and disproportionate to the needs of the case and as seeking information and/or documents that are not relevant to any claim or defense in this litigation. OpenAI objects to the extent that this Request calls for the discovery of information protected by attorney-client privilege, the attorney work-product immunity and/or any other applicable privilege under federal, state or local law.

Subject to the foregoing General and Specific Objections, OpenAI states that it has produced documents sufficient to show its June 22, 2023 responses on the record to Senator Thomas Roland Tillis's questions at OPCO_SDNY_0000014-24.

REQUEST FOR PRODUCTION NO. 97:

Documents Relating to your “continue[d]engage[ment]” with writers.

RESPONSE TO REQUEST FOR PRODUCTION NO. 97:

OpenAI objects to the production of electronically stored information before an applicable ESI protocol has been entered. OpenAI objects to this Request as unduly burdensome and disproportionate to the needs of the case and as seeking information and/or documents that are not relevant to any claim or defense in this litigation. OpenAI objects to the extent that this Request calls for the discovery of information protected by attorney-client privilege, the attorney work-product immunity and/or any other applicable privilege under federal, state or local law.

Subject to the foregoing General and Specific Objections, OpenAI states that it has produced documents sufficient to show its June 22, 2023 responses on the record to Senator Thomas Roland Tillis's questions at OPCO_SDNY_0000014-24.

Dated: August 15, 2024

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